

REMARKS

Claims 1-9, 24-32, and 46-54 are pending. Claims 1-9, 24-32, and 46-54 have been amended to more particularly point out and claim the subject matter of the invention. No claims have been canceled or added.

Withdrawal of the rejections to the pending claims is respectfully requested.

35 USC §102(b) Rejections

Claims 1, 2, 5, 24-25, 28, 46, 49 and 54 stand rejected under 35 USC §102(b) as being anticipated by U.S. patent application No. 5,873,076 to Barr et al. ("Barr"). These rejections are traversed.

Claim 1 recites

- detecting input from a user;
- responsive to the detecting and independent of whether the input is associated with an explicit query:
 - analyzing at least a subset of the user input;
 - predicting desired access to one or more media files based on the analysis;
 - retrieving information corresponding to one or more media files from a media content source customized to the user; and
 - presenting the information to a user for suggested access.

In addressing claim 1, the Office Action ("Action") asserts that Barr describes "analyzing the input" at col. 7, line 5-10. Yet, the features of claim 1 include more than just "analyzing the input". The features of claim 1 will perform operations of "analyzing at least a subset of the input", "predicting desired access",

"retrieving information", and "presenting the information" **completely "independent of whether the input is associated with an explicit query"**, (emphasis added) as claim 1 recites. (See also, the specification at page 18, lines 12-21).

In contrast to these claimed features, the cited portion of Barr from col. 6, line 66 through col. 7, line 10, merely describes a system that searches for documents in a database responsive to receipt of an explicit query from a user. This does not anticipate the claimed feature, because unless the system of Barr receives such a query, the system of Barr will not search the database. Since the operations of Barr are completely dependent on receiving a query from a user, the cited portion of Barr (and Barr as a whole) does not anticipate operations that are "independent of whether the input is associated with an explicit query". Since Barr does not describe each and every element of claim 1, as set forth by claim 1, Barr cannot anticipate claim 1.

Withdrawal of the 35 USC §102(b) rejection of claim 1 is requested.

Claims 2 and 5 depend from claim 1 and are not anticipated by Barr solely by virtue of this dependency. Withdrawal of the 35 USC §102(b) rejection of claims 2 and 5 is requested.

Claim 24 recites:

- detecting user input;
- responsive to detecting the user input and independent of whether the user input is associated with an explicit query:
 - analyzing at least a subset of the user input in view of semantic text and user intention and preference patterns, the semantic text comprising the at least a subset and previously collected text from a personal media database

customized for the user, the previously collected text being semantically related to one or more previous multimedia accesses by the user;

- predicting desired access to one or more media files based on the analysis;
- retrieving information corresponding to one or more media files from a media content source; and
- presenting the information as a suggestion.

For at least the reasons discussed above with respect to claim 1, Barr does not anticipate these claim features.

Moreover, the Action at section 9 concedes that Barr does not describe "identifying media content use patterns, and wherein analyzing the user input further comprises evaluating the user input based on the media content use patterns". Thus, Barr cannot anticipate "analyzing at least a subset of the user input in view of semantic text and user intention and preference patterns, the semantic text comprising the at least a subset and previously collected text from a personal media database customized for the user, the previously collected text being semantically related to one or more previous multimedia accesses by the user", as claim 24 requires.

Withdrawal of the 35 USC §102(b) rejection of claim 24 is requested.

Claims 25 and 28 depend from claim 24 and are not anticipated by Barr solely by virtue of this dependency. Withdrawal of the 35 USC §102(b) rejection of claims 24 and 28 is requested.

Claim 46 recites:

- detecting user input;

- responsive to detecting the user input and independent of whether the user input is associated with an explicit query:
 - analyzing the user input;
 - predicting desired access to one or more media files based on the analysis;
 - retrieving information corresponding to one or more media files from a media content source; and
 - presenting the information as a suggestion.

For the reasons discussed above with respect to claim 1, Barr does not anticipate these claim features.

Withdrawal of the 35 USC §102(b) rejection of claim 46 is requested.

Claim 49 depends from claim 46 and is not anticipated by Barr solely by virtue of this dependency. Withdrawal of the 35 USC §102(b) rejection of claim 46 is requested.

Claim 54 recites processing means for:

- detecting user input; and
- responsive to detecting the user input and independent of whether the user input is associated with a query:
 - analyzing the user input;
 - predicting desired access to one or more media files based on the analysis;
 - retrieving information corresponding to one or more media files from a media content source; and
 - presenting the information as a suggestion.

For the reasons discussed above with respect to claim 1, Barr does not anticipate these claimed features.

Withdrawal of the 35 USC §102(b) rejection of claim 54 is requested.

Claims 3, 26, and 47 stand rejected under 35 USC §103(a) as being unpatentable over Barr in view of US patent number 5,999,942 to Talati. This rejection is traversed.

Claim 3 recites "wherein the input is text in a word processor document or in an e-mail." Although the Action concedes that Barr does not teach or suggest this feature, the Action asserts that Talati teaches this feature at col. 15, lines 50-55. Applicant disagrees. As the Action points out, this cited portion of Talati merely teaches that **a user query that is received by the system of Talati is comprised of the following words** "switch to word processor and update the Appage™ page 'word.veb'". Clearly, a received user query that is comprised of these or any other any number and combination of words does not teach or suggest that the received user query "is text in a word processor document or in an e-mail", as claim 3 requires. Even Talati does not interpret these teachings that way. Instead, Talati without addressing the provenance of the received query merely teaches (col. 15, lines 47-57) that responsive to receiving such a query, an application switches to a word processing application and loads the indicated page into the word processing application. Nowhere does this teach or suggest that "the input [which the Action is correlating to "a user query"] is text in a word processor document or in an e-mail", as claim 3 requires.

Withdrawal of the 35 USC §103(a) rejection of claim 3 is requested.

For the reasons discussed above with respect to claim 3, withdrawal of the 35 USC §103(a) rejection of **claims 26 and 47** is requested.

Claims 4, 27, and 48 stand rejected under 35 USC §103(a) as being unpatentable over Barr in view of US patent number 6,895,552 to Balabanovic.
This rejection is traversed.

Claim 4 recites in part:

- “responsive to detecting the user interest, displaying a high-level feature corresponding to the item, the high-level feature being stored in a database customized to the user.”

The cited combination does not teach or suggest the features of **claim 4, which depends from claim 1**. With respect to claim 1 and Barr, for the reasons already discussed, Barr is completely silent with respect to any teaching or suggestion of receiving user input and performing set of operations based on user input “independent of whether the input is associated with an explicit query”, as required by claim 1. In contrast, the system of Barr is completely reliant on receiving such a query. Thus, Barr does not teach or suggest all of the features of claim 1, which is the base claim of claim 4.

The Action relies on Balabanovic for the teaching at col.2, lines 1-6, and recited as: "a technique described herein extracts visual features from the document and ranks multiple pages of the document based upon at least one or more visual features of the page. The pages may be presented on a graphical user interface (GUI) to a user with features being displayed that are ranked higher." Clearly, this teaching of Balabanovic when combined with the teachings of Barr that depend on receipt of an explicit query do not teach or suggest “independent of

whether the input is associated with an explicit query” as claim 1 requires. Thus, the cited combination does not teach or suggest the features of claim 4 solely by virtue of its dependency on claim 1.

Additionally, the Action concedes that Barr does not teach or suggest “responsive to detecting the user interest, displaying a high-level feature corresponding to the item, the high-level feature being stored in a database”, as claim 4 requires. Attempting to arrive at this feature, the Action modifies Barr with the teachings of Balabanovic at col. 2, lines 1-6, which are recited in the immediately preceding paragraph. A close examination of that cited portion shows that it is completely silent with respect to “the high-level feature being stored in a database customized to the user”, as claim 4 requires.

For each of these reasons, withdrawal of the 35 USC §103(a) rejection of claim 4 is requested.

For the reasons discussed above with respect to claim 4, withdrawal of the 35 USC §103(a) rejection of **claims 27 and 48** is requested.

Claims 6-7, 29-30, and 50-51 stand rejected under 35 USC §103(a) as being unpatentable over Barr in view of US patent number 6,480,843 to Li. This rejection is traversed.

Claims 6-7, 29-30, and 50-51 are not obvious over Barr in view of Li at least for reasons based on their dependencies to respective ones of basic claims 1, 24, and 46. For example, for the reasons already discussed above, Barr does not teach or suggest:

- “independent of whether the input is associated with an explicit query” performing operations of "analyzing", "predicting", "retrieving", and "presenting", as base claim 1 and dependent claims 6-7 require.
- "responsive to detecting the user input and independent of whether the user input is associated with an explicit query from a user" performing operations of "analyzing", "predicting", "retrieving", and "presenting", as base claims 24 and 46, and dependent claims 29-30 and 50-51 require.

The Action relies on Li for the teaching of [sic] “the query is expanded by replacing the query words by thereof corresponding higher-level semantic concept and syntactically relationship. To support query expansion, indices of words related by lexical semantics and syntactical relationships, such as co-occurrence, need to be maintained. The indices for related words by lexical semantics can be constructed as a hierarchical structure (col. 7, lines 20-25; col. 2, lines 10-15).” Clearly, these teachings of Li when combined with Barr do not cure the above discussed deficiencies of Barr with respect to these rejected claims, and the cited combination does not teach or suggest the features of base claims 1, 24, and 46. Thus, claims 6-7, 29-30, and 50-51 are allowable over the cited combination solely by virtue of their dependencies on respective ones of these base claims.

Withdrawal of the 35 USC §103(a) rejections of claims 6-7, 29-30, and 50-51 is requested.

Claims 8, 31, and 52 stand rejected under 35 USC §103(a) as being unpatentable over Barr in view of US patent number 5,682,539 to Conrad. This rejection is traversed.

Claims 8, 31, and 52 are not obvious over Barr in view of Li at least for reasons based on their dependencies to respective ones of basic claims 1, 24, and 46. For example, for the reasons already discussed above, Barr does not teach or suggest:

- "independent of whether the input is associated with an explicit query" performing operations of "analyzing", "predicting", "retrieving", and "presenting", as base claim 1 and dependent claim 8 requires.
- "responsive to detecting the user input and independent of whether the user input is associated with an explicit query from a user" performing operations of "analyzing", "predicting", "retrieving", and "presenting", as base claims 24 and 46, and dependent claims 31 and 52 require.

The Action relies on Conrad for the teaching of "user input sentence is received and a pattern is generated from the words of the input sentence. An algorithm stored in the computer is applied to select which of the number of general meaning notes is intended by the user by comparing the input sentence pattern to the typical sentence patterns (Abstract)." Clearly, these teachings of Conrad when combined with Barr do not cure the above discussed deficiencies of Barr with respect to these rejected claims. As a result, the cited combination does not teach or suggest the features of base claims 1, 24, and 46. Thus, claims 8, 31, and 52 are allowable over the cited combination at least for reasons based on their dependencies on respective ones of these allowable base claims.

Withdrawal of the 35 USC §103(a) rejections of claims 8, 31, and 52 is requested.

Claims 9, 32 and 53 stand rejected under 35 USC §103(a) as being unpatentable over Barr in view of US patent number 6,366,908 to Chong. This rejection is traversed.

Claims 9, 32, and 53 are not obvious over Barr in view of Li at least for reasons based on their dependencies to respective ones of basic claims 1, 24, and 46. For example, for the reasons already discussed above, Barr does not teach or suggest:

- “independent of whether the input is associated with an explicit query” performing operations of “analyzing”, “predicting”, “retrieving”, and “presenting”, as base claim 1 and dependent claim 9 requires.
- “responsive to detecting the user input and independent of whether the user input is associated with an explicit query from a user” performing operations of “analyzing”, “predicting”, “retrieving”, and “presenting”, as base claims 24 and 46, and dependent claims 32 and 53 require.

The Action modifies Barr with Chong’s recited teaching of “keyfact-based retrieval method, which extracts precise keyfact patterns included in a natural query of a user using the natural language processing techniques and retrieves documents similar to the query and the keyfact-based index file, is provided (col. 2, lines 15-20).” Clearly, these teachings of Chong when combined with Barr do not cure the above discussed deficiencies of Barr with respect to these rejected claims. As a result, the cited combination does not teach or suggest the features of base claims 1, 24, and 46. Thus, claims 9, 32, and 53 are allowable over the cited combination at least for reasons based on their dependencies on respective ones of these allowable base claims.

Withdrawal of the 35 USC §103(a) rejections of claims 9, 32, and 53 is requested.

Moreover, claim 9 also recites "wherein the suggested access is an insert or attach media content operation". The feature of claim 9 is not taught or suggested by the references of record. For this additional reason, withdrawal of the 35 USC §103(a) rejections of claims 9 is requested.

Conclusion

Pending claims 11-9, 24-32, and 46-54 are in condition for allowance and action to that end is respectfully requested. Should any issue remain that prevents allowance of the application, the Office is encouraged to contact the undersigned prior to issuance of a subsequent Office action.

Respectfully Submitted,

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